

August 31, 2007

Mr. Devon Muto  
Department of Planning and Land Use  
County of San Diego  
5201 Ruffin Road  
San Diego, CA 92123

Subject: R04-017; STP 06-004; Log No. 04-09-014—Parking Rezone—Aesthetics/Visual Impacts

Dear Mr.Muto:

This letter report presents a brief project description, visual analysis, and proposed mitigation of aesthetic/visual impacts for the proposed paved parking lot at the intersection of Valley Center and North Lake Wohlford roads in Valley Center.

## **Introduction**

The San Pasqual Casino Development Group is in the process of expanding the existing Valley View Casino for the San Pasqual Band of Mission Indians (Tribe). Additional employee parking area is currently needed due to construction activities, and additional employee parking will be needed due to the expansion of the Casino. The Tribe proposes to use a portion of a nearby parcel that they own to provide additional employee parking.

## **Project Location and Description**

The 9.45-acre parcel is located in the southwest quadrant of the Valley Center Road and North Lake Wohlford Road intersection, and has approximately 1,125 feet of frontage on Valley Center Road and 350 feet of frontage on North Lake Wohlford Road. With the exception of one parcel to the northwest and two parcels to the southeast, the A70 use regulation surrounds all four sides of the project site. Adjacent land use to the south is the Valley Center Middle School. To the east, across North Lake Wohlford Road, is small-scale agriculture with a single-family residence. To the north, across Valley Center Road, there are a variety of commercial, single-family residential, and greenhouse agricultural uses. To the west, a large single-family lot with a residence built on the southern portion sits adjacent to the Middle School.

Approximately 3.5 acres of the 9.45-acre parcel are proposed for the actual paved parking use. This 3.5-acre area is located in the eastern section of the parcel, approximately 500 feet from the

western parcel boundary. This area extends in the north/south direction from Valley Center Road to the Valley Center Middle School property. The northern boundary of the area to be used for parking is Valley Center Road, and the eastern boundary is North Lake Wohlford Road—both Circulation Element roads. The southern boundary is the Valley Center Middle School, and the western boundary of the paved parking area is about 500 feet from the large single-family residential lot.

## **Existing Conditions**

Mooney • Jones & Stokes conducted on-site inspections and viewed aerial photos to assess existing conditions. A 2005 aerial photo showing the existing parking lot and a 2003 aerial photo showing adjacent land uses are attached to this letter report as Appendix A. Approximately 60,000 square feet of the parcel has been paved with asphalt for parking purposes. This impacts the northeasterly 1.8 acres of the portion of the project site located north and east of School Bus Road. The existing paved parking lot is immediately adjacent to the current Valley Center Road right-of-way. In 2006, an additional 23 feet of road right-of-way adjacent to Valley Center Road and an additional 30 feet of right-of-way were granted to the County of San Diego to accommodate the construction of improvements to the intersection of Valley Center and North Lake Wohlford Roads. The paved surface of the parking lot is currently several feet higher than Valley Center Road, and no vegetation exists to screen the parking lot from Valley Center Road.

The remainder of the parcel is undeveloped, except for a private road (School Bus Road) used for the staging of school buses that pick up and drop off Valley Center Middle School students. The private road bisects the Tribe's parcel in a north/south direction approximately 500 feet from the western parcel boundary and defines the westerly edge of the proposed parking area. The private road makes a 90-degree easterly turn near the middle of the parcel's southerly boundary and parallels the entire southerly boundary of the proposed parking area approximately 50 feet south of the project site.

Prior to January 2006, the existing, non-permitted parking lot was lighted from dusk to dawn with portable light fixtures powered by diesel generators. These light fixtures used high intensity metal halide lamps that were not shielded from adjacent properties. Pursuant to a citation issued by the County of San Diego, the unshielded metal halide fixtures were replaced with shielded low-pressure sodium cutoff light fixtures that conform with the County's Dark Sky Policy and the Light Pollution Ordinance. The shielding of the light source from adjacent streets and properties along with the perceived reduction in light intensity created by using low-pressure sodium lights has greatly reduced lighting impacts to surrounding residents and community members. The diesel generators that have been retrofitted with noise-attenuating insulation still currently power the low-pressure sodium fixtures.

## **Viewers**

The primary view of the existing and proposed parking area is from Valley Center Road and North Lake Wohlford Road and the adjacent properties to the north and east. There is a residence and a commercial business with another residence behind the commercial building located to the north, across Valley Center Road from the project site. This closest residence is located directly north of the School Bus Road/Valley Center Road intersection, about 150 feet north of the northern edge of the proposed parking lot. The second residence is located about 300 feet north of the North Lake Wohlford Road/Valley Center Road intersection behind a commercial building and storage yard for a small pump supply and repair business that fronts Valley Center Road. The single residence located to the east, across North Lake Wohlford Road, is about 200 feet east of the eastern edge of the proposed parking lot and is densely screened from view by a mature citrus grove that surrounds the residence. A small number of viewers using School Bus Road would also have a primary view of the parking area. Primary viewers would have the parking area dominate the view of their surroundings.

Secondary views from a distance greater than 250 feet are from adjacent properties that overlook the parking area from areas of slightly higher elevation located to the southwest and north. An exhibit titled Viewshed Analysis is attached as Appendix B to show the nearby areas from which the parking area would be visible. Photographs taken from various locations with views of the parking lot are also included in Appendix B. Secondary viewers would include the parking area as a portion of their overall view of their surroundings. Approximately 40 additional residences would be able to see the parking lot at distances ranging from 500 to 2,000 feet.

Several nearby land uses are commercial, institutional, or civic in nature. An exhibit showing the location of the various commercial, institutional and civic uses, with photographs of the uses, is attached in Appendix C. Many of these nearby commercial, institutional and civic land uses have nighttime lighting for security purposes that are used either for special events or on a nightly basis. Most of the existing outdoor lighting use low-pressure sodium light sources in conformance with the Light Pollution Ordinance. These uses include Valley Center Middle School, Valley Center Fire Station No. 73, Valley Center Sheriff's Station, and streetlights along North Lake Wohlford Road. An exhibit indicating the type and location of the existing outdoor lighting fixtures is attached as Appendix D.

## **Aesthetic/Visual Impacts**

The proposed parking lot would introduce approximately 3.5 acres of paved surface, more than 400 parked cars and 25-foot high lighting fixtures into the existing rural setting. The construction and operation of the proposed parking lot would be incompatible with the existing setting and create significant aesthetic/visual impacts to viewers with both primary and

secondary views of the proposed project unless the mitigation measures described below are implemented.

## **Lighting Impacts**

The dusk to dawn nighttime lighting of the proposed parking lot is necessary for the safety of the Valley View Casino employees. The proposed safety lighting will also allow for the use of cameras for remote surveillance by security personnel. A total of 25 dual lighting fixtures mounted 25 feet above the paved surface is proposed. The fixtures are full shield cutoff with low-pressure sodium light sources to conform to the Light Pollution Ordinance. The total wattage used by these fixtures is 9,840 watts, which is 3,510 less wattage than allowed by the California Energy Commission for a rural hardscape parking lot. This will result in illumination levels between 10.92 foot candles (fc) and 0.1 fc within the paved parking area (a full moon creates .02 fc of light). The light will fade to less than .01 fc within 70 feet of the edge of the paved surface without additional obstruction such as landscaping.

The lighting of the proposed parking area has been designed to provide adequate lighting for the safety and security of the casino employees while minimizing light spillage on adjacent properties and glare created by reflecting light from pavement and cars. However, the proposed lighting would be incompatible with the existing setting and create significant aesthetic/visual impacts to viewers with both primary and secondary views of the proposed project unless the mitigation measures described below are implemented.

## **Proposed Mitigation**

The following measures are proposed to mitigate aesthetic/visual impacts to an acceptable level. The primary means of mitigation would be to screen the parking area from the view of adjacent properties and roads. In addition, low-pressure sodium light fixtures that are designed to shield the light source from adjacent parcels and direct light downward will replace the existing temporary light fixtures that are powered by portable diesel generators. The proposed permanent lighting will be connected to the existing adjacent electrical infrastructure. A Conceptual Landscape Plan prepared for the Site Plan (STP06-004), as required by the proposed B and D Special Area Designators, has been accepted by the Department of Planning and Land Use (DPLU). The Conceptual Planting Plan proposes a mixture of trees, shrubs, and ground cover that will create a dense landscape screen between the parking area and both Valley Center Road to the north and North Lake Wolford Road to the east. Dense screening landscaping is also proposed along both the south and western edge of the parking lot to screen it from the Valley Center Middle School and residences that overlook the parking lot from the south and west. Additionally, landscaping within the interior of the parking lot will be incorporated to reduce the visual impacts to residents overlooking it and to conform to Section 6712 of the Zoning Code and the Valley Center Design Guidelines. The Valley Center Design Review Board has

reviewed the Site Plan, which includes a Conceptual Striping/Grading Plan, Conceptual Landscape Plan, Conceptual Lighting Plan, and Elevations and Details. They have unanimously recommended approval of the Site Plan. The Valley Center Community Planning Group has also reviewed the proposed rezone that would allow the proposed parking use and the accompanying Site Plan and recommended approval of the project.

1. The use of landscaping to screen the parking area from Valley Center Road and North Lake Wofford is the highest priority. Landscape screening, rather than walls or fences, would be more compatible with the existing setting. The proposed landscape treatment includes dense shrubs, earthen mounding, and boulder groupings to screen vehicles from the primary viewers on the adjacent roads and lots. Planting of a variety of evergreen and flowering tree species will screen outdoor lighting fixtures from primary viewers and both the vehicles and lighting fixtures from the secondary viewers overlooking the parking lot.

The dense landscape screening, boulders, and earthen mounding will be located adjacent to the ultimate right-of-way of Valley Center Road and North Lake Wofford Road and be 20 feet in depth. Approximately 43 feet of the existing parking surface will need to be removed to accommodate the 23 feet needed for the additional right-of-way for Valley Center Road and the 20 feet of dense landscaping. The dense landscape perimeter of the paved parking area is equal to about 8% of the paved parking area. Since the interior landscaping needs to be at least 5% of the parking area, a minimum of 13% of the portion of the parcel used for parking will be landscaped.

The Valley Center Design Guidelines describe the minimum setback from Valley Center Road ultimate right-of-way for parking areas to be 20 feet. North Lake Wofford Road is not included in the Guidelines; however, parking will also be setback 20 feet from the ultimate right-of-way. This 20-foot setback is intended to provide an adequate area for planting, low walls, and/or earthen berms to completely screen parking and service areas from view. This minimum standard is adequate to completely screen the parking lot from the adjacent Circulation Element roads.

2. The reduction of nighttime light that might spill onto adjacent properties is also a high priority. The lighting design and analysis, attached to this letter report as Appendix E, proposes 25 interior dual-lamp fixtures. The revised lighting design provides the optimum light fixture spacing and height that will minimize light spillage on adjacent parcels and result in the least reflected light from parked vehicles, while satisfying the mandatory Title 24 outdoor lighting requirements. This results in light fixtures that are 25 feet tall, which is not in conformance with the Valley Center Design Guidelines. The 25-foot tall fixtures enable the fixtures to be located within the interior of the parking lot rather than around the perimeter, which is close to Valley Center and North Lake Wofford Roads. Reducing the height of the lights to conform with the Guidelines would result in a higher intensity of reflected light from the vehicles located directly beneath the fixtures.

The use of earthen berming and a grading plan design that lowers the parking surface below the level of Valley Center Road will both increase the effective height of screening shrubs and trees as well as lower the apparent height of the lighting fixtures. Thus, when viewed from Valley Center Road the apparent height of the light fixtures will appear to be 22 feet rather than their actual 25 feet and will be within the interior of the parking lot rather than along the frontages of Valley Center and North Lake Wohlford Roads. Placement of evergreen trees, which will screen both the view of the light fixture and the light from the fixture from primary and secondary viewers, will provide some additional mitigation.

The lighting analysis in Appendix E determined that the lumens created by the proposed nighttime lighting fade to less than .01 foot-candles (fc) (a full moon creates .02 fc of light) within 70 feet of the edge of the parking lot without obstructions such as dense landscaping. With the dense landscaping, no objectionable amount of light will spill onto adjacent parcels.

3. The use of dense screening landscaping to screen the south and west sides of the parking area is also proposed. A combination of trees, shrubs, and groundcover is proposed along the western side. Dense landscape screening will be installed on the west side of School Bus Road to screen primary and secondary views of the parking lot from both eastbound Valley Center Road and residents overlooking the project from the west. Locating the landscape screening on the west side of School Bus Road will allow security patrols to observe the parking lot from School Bus Road while still providing screening from Valley Center Road and residents. The proposed landscape screening along the southern edge of the parking lot will screen the project from the secondary viewers overlooking the parking lot from the south.

## **Proposed Mitigation Implementation**

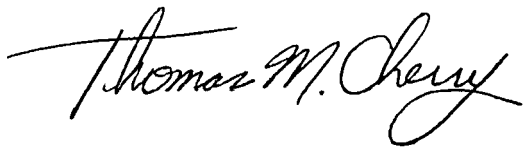
To assure that the parking use allowed in the S86 zone implements the proposed mitigation measures described above, the zone shall have a "D" Special Area designator because a rezone cannot have conditions attached to its approval. The "D" Special Area designator requires that a Site Plan be prepared, reviewed, and approved as specified in Design Review Area Regulations (Section 5900-5910 of the Zoning Ordinance). Several design review criteria are proposed in the submittal letter that accompanies this letter report. The Board of Supervisors may require additional specific review criteria at the time that the "D" designator is applied to the zone. Ongoing operational conditions may be imposed on the project that will monitor and enforce the requirement that all perimeter planting be selected and sized to provide sufficient screening within two growing seasons.

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## **Conclusion**

With the proposed landscape screening, the proposed parking use will be compatible with the character of the existing setting.

Respectfully submitted,

A handwritten signature in black ink, reading "Thomas M. Cherry". The signature is written in a cursive, flowing style with a large, stylized 'T' and 'C'.

Thomas Cherry, ASLA  
Principal Landscape Architect

Enclosures: Appendices A-E